

3-17-00  
jc

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

**1: CV 00-0486**

PAUL LEE  
Plaintiff,

vs.

UNITED STATES OF AMERICA, et al,  
Defendants,

Civil Action No. \_\_\_\_\_

JURY TRIAL DEMANDED

**FILED  
SCRANTON**

**MAR 15 2000**

PER 4  
DEPUTY CLERK

COMPLAINT

Plaintiff, Paul Lee pro-se, hereby files this complaint against the above named defendant's under Federal Tort Claim Act.

JURISDICTION

This court has jurisdiction pursuant to 28 U.S.V. §§ 2670-2680 and § 1331, these statutes disallow tort action against the United States, and request to answer and resolve federal question.

PARTIES

Paul Lee, plaintiff pro-se is a federal inmate at F.C.I Allenwood, P.O.BOX 2000 White deer, Pa. 17887

United States of America, is defendant whose address is at Justice Building, Tenth Street and Constitution Avenue NW Washington, D.C. 20530.

Kathleen Hawk-Sawyer, is defendant in her capacity as Director Bureau of Prisons at 320 First Street, NW Washington, D.C. 20534

Bureau of Prisons, is a defendant, in their capacity whose address is at 320 First Street, NW Washington D.C. 20534.

CAUSE OF ACTION

1. This action arises under Federal Tort Claims Actt, 28 U.S.C. §§ 2671-2680.

2. During all the times herein mentioned, defendants was responsible for providing for the safekeeping, care and subsistence of plaintiff.

3. During the first part of 1995, plaintiff entered into the custody of defendants as strong, able-bodied man.

4. During the first part of plaintiff incarceration, defendants provided plaintiff with a spring bed, now defendants has provided plaintiff with a steel bed and substandard mattress to sleep on, with out a box spring.

5. By reason of defendant's negligence in thus provided plaintiff with in-proper bedding plaintiff hip has steadily deteriorated from 1997 to the present time, and he now suffers from degenerative arthritis.

6. Defendant's has negligently, failed to provide him with medical care and treatment for his injury.

7 . By reason of defendant's negligence, these injuries have made plaintiff incapable of any gainful employment, and he has suffered great physical and mental pain.

RELIEF SOUGHT

WHEREFORE, plaintiff demands judgment against defendant's in the sum of \$ 2.5 millions dollars, and cost.

Respectfully submitted,

On this 9th of February, 2000

CL  
Paul Lee, pro-se 01656-087  
P.O.BOX 2000  
White deer, Pa. 17887